

EXHIBIT 22

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
NO. 5:18-CV-0073-D

JAMES S. DEW, et al.,) V-I-D-E-O-T-A-P-E-D
)
PLAINTIFFS,) D-E-P-O-S-I-T-I-O-N
)
v.) OF
)
E. I. DU PONT DE NEMOURS) JOHN STEVENS
AND COMPANY, et al,)
)
DEFENDANTS.)

JAMES O'BRIEN, et al.,)
)
PLAINTIFFS,)
v.)
)
E.I. DU PONT DE NEMOURS)
AND COMPANY, et al,)
)
DEFENDANTS.)

* * * * *

ON DECEMBER 7, 2022, AT THE DOUBLETREE BY HILTON

APPEARANCES OF COUNSEL:

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REPORTED BY: Shelia Darden

JOB NO. 219193

JOHN STEVENS

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A. 7619 North Carolina Highway 87 South, Fayetteville,

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28306.

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Q. How long have you lived there?

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A. 1985.

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Q. Do you own your home there?

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A. Yes, ma'am.

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Q. Who lives with you?

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A. My wife.

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Q. I take it she has lived there since 1985, as well?

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A. Yes, ma'am.

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Q. Why did you move to the property on Highway 87?

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A. I get that question a lot. My parents were around

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80 -- 85 years old and I moved back to be near them is the

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main reason, to take care of my two elderly parents.

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Q. Did they live on property nearby that?

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A. Oh, no, they lived ten miles from where I live.

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Q. Can you describe for me your home and the land

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surrounding it?

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A. I guess you could -- It would be considered a ranch

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style home, wood frame home, with about four acres. I think

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it's 3.8 acres, to be exact. And it's around, I want to say,

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12 or 1,300 square foot. Three bedroom.

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Q. Do you know how many acres your total lot size is?

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A. Well, it used to be broke up into -- there's one,

JOHN STEVENS

A. It must have been after this picture was taken, cause I don't see it there.

Q. Thank you, and you can go ahead and set that to the side and the court reporter will take it later. How many bedrooms are in your home?

A. Three.

Q. How many bathrooms?

A. I've got a half bath and I've got a full bath.

Q. Would you consider your property to be in a rural area or a suburban area?

A. I consider it to be in a rural area.

Q. How close is your nearest neighbor's home?

A. I'd say 300 yards.

Q. Are there any bodies of water on your property?

A. No, ma'am.

Q. I believe you said earlier that you purchased the property in 1985, is that correct?

A. I think it was in '83 or '4, 'cause I didn't move there until '85.

Q. Based on the answers that you all gave to your interrogatories, I understand that there were a couple different purchases of property and you had a house moved there. Can you tell me about that whole process?

A. Yeah. It was a one-acre lot where my house is here.

JOHN STEVENS

And I bought a farmhouse and had it moved in there and completely tore it -- I mean, just threw all the bad material away and started from the ground up. And -- And used some of the material, the heavy timbers and stuff that were really in good shape, and everything else is basically new in this house. All the walls are new. New sheetrock, new plumbing when the house was done in '84 or '85, new -- new electrical, everything there.

Q. Do you recall where the farmhouse was before you moved it to this property?

A. I do. I know exactly. Bladen County.

Q. Do you know if you added the cost of the purchase of the land and moving the farmhouse and renovating the farmhouse, what that total cost would be?

A. Today?

Q. What it was -- I'm sorry. What it was back in 1983 to '85.

A. I can't -- I can't -- Seem like the number on moving that house, only moving that house was somewhere in the range of \$1,500. It wasn't a lot. But the price of the -- the construction was much more than that.

Q. Did you get a mortgage on the construction?

A. No, I didn't. I bought the property under a mortgage, but -- and it was a trailer on that -- on that lot.

JOHN STEVENS

I sold the trailer and I had the trailer and the one-acre lot under contract and making payments on it. So I -- I done that for a couple of years, three years, and then I paid the property off.

Q. What about the renovations to the farmhouse, did you have to get a mortgage or any type of loan for that, or did you pay for those renovations in cash?

A. Oh, I did. I went -- I think it was Bank of America and you got a mortgage so I could, you know, pay for some of the cost on it. Although we done it ourself, family members.

Q. When you say you did it yourself, you mean did most of the work and the renovations yourself?

A. Me and my son and my brother-in-law, different people.

Q. Do you still have the mortgage on the property at all?

A. No.

Q. Do you know when you paid it off?

A. Gosh, we should ask my wife. It's been many years. I can't recall.

Q. Who did you purchase the land from?

A. Where my house is?

Q. Yes.

A. It was purchased the house and -- and little single-